

JAMES McGAUGHEY
201 E 6TH ST
VERMONT IL 61484
(309)784-2481

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Certification of CPNI Filing (February 6, 2006)
EB-06-TC-060
EB Docket #06-36

Dear Ms. Dortch:

Transmitted herewith in accordance with the Commission's Public Notice, DA 06-258, released February 2, 2006, and Section 64.2009(e) of the Commission's Rules, is our compliance certificate and accompanying statement for the year ended December 31, 2005.

Very truly yours,

James I. McGaughey

FRN: 0002894483

cc: byron.mccoy@fcc.gov
fcc@bcpiweb.com

CERTIFICATION

I, James I. McGaughey, hereby certify this 6th day of February, 2006, that I am an individual (sole proprietor) providing telecommunication services and that I have established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001-2009.

James I. McGaughey
Owner

STATEMENT

James I. McGaughey (Carrier)”has established operating procedures that ensure compliance with the Federal Communication Commission (Commission)”regulations regarding the protection of consumer proprietary network information (CPNI).”

- Carrier has implemented a system whereby the status of a customer s’CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates sales and marketing campaigns that use its customer CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier s’sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI.